



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: Norfolk Southern Railway Company - Chattahoochee TBT

Facility Address: 3095 Parrott Avenue Northwest
Atlanta, Georgia 30318 Fulton County

Mailing Address: 1200 Peachtree St NE, Box 13
Atlanta, GA 30309-3579

Facility AIRS Number: 04-13-121-00962

is issued a Permit for the following:

Construction and operation of a facility to store and transfer volatile organic liquid and bulk solid commodities between railcars and trucks. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 27467 dated March 12, 2020; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **13** pages.



[Draft]

Richard E. Dunn, Director
Environmental Protection Division

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 1 of 13

1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.
- 1.6 For all equipment subject to 40 CFR 60, *Standards of Performance for New Stationary Sources*, the Permittee shall comply with the applicable provisions of 40 CFR 60 Subpart A, *General Provisions*.
[40 CFR 60.1-19]

2. Allowable Emissions

- 2.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility volatile organic compounds (VOC), nitrogen oxides (NO_x) or sulfur dioxide (SO₂) emissions in amounts equal to or in excess of 100 tons during any twelve consecutive months. [Avoidance of 40 CFR 70, *State Operating Permit Programs*, for title V of the Clean Air Act and Avoidance of Nonattainment New Source Review]

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 2 of 13

- 2.2 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility any single hazardous air pollutant (HAP) which is listed in Section 112 of the Clean Air Act, in an amount equal to or exceeding 10 tons during any twelve consecutive month period, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any twelve consecutive month period.

[Avoidance of 40 CFR 70, *State Operating Permit Programs*, for title V of the Clean Air Act]

- 2.3 The Permittee shall comply with the following limits:

Source	Description	Pollutant	Maximum Throughput during any twelve-month rolling period	Maximum Emissions
EU-1	Transloading of product from storage tanks (EU-4, EU-5, and EU-6) to tanker trucks using loading rack	VOC	600,000,000 gallons*	12 mg/L liquid loaded (0.1 lb/1000 gallons)**

*Product may also be transloaded from storage into pipeline, which is not an air emitting scenario and would not be included in this limitation.

**This limit applies for operation of the vapor combustion unit (VCU).

- 2.4 The Permittee shall comply with the applicable provisions of 40 CFR 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984*. In particular, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ (39,890 gal) containing a volatile organic liquid (VOL) that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa or with a design capacity greater than or equal to 75 m³ (19,813 gal) but less than 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa, shall equip each storage vessel with fixed roof in combination with an internal floating roof meeting the following specifications:

[40 CFR 60.112b(a)(1)]

- a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- b. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 3 of 13

- ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - iii. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
 - h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
 - i. Each penetration of an internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- 2.5 The Permittee shall not cause, let, suffer, permit, or allow emissions from any processes at this facility the opacity of which is equal to or greater than forty percent.
[391-3-1-.02(2)(b)1]

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 4 of 13

- 2.6 The Permittee shall not cause, let, suffer, permit, or allow the rate of emission of particulate matter in total quantities from any processes at this facility to equal or exceed the allowable rate calculated as follows:

[391-3-1-.02(2)(e)1(i)]

- a. For process input weight rate up to and including 30 tons/hr:
 $E = 4.1P^{0.67}$; or
- b. For process input weight rate above 30 tons/hr:
 $E = 55P^{0.11} - 40$

Where:

E = allowable PM emission rate in pounds per hour

P = total dry process input weight rate in tons per hour.

- 2.7 The Permittee shall employ the following reasonably available control technology (RACT) for the operation of these processes and equipment:

[391-3-1-.02(2)(tt) - RACT]

- a. Storage Tanks EU-4, EU-5, and EU-6

- i. Equip with submerged fill pipe.
- ii. Have a light-colored exterior.
- iii. Construct using good engineering design and operate in accordance with the testing and procedures in 40 CFR 60 Subpart Kb, manufacturer-specified maintenance, and/or industry standards, as appropriate.

- b. Storage Tank EU-7

- i. Equip with submerged fill pipe.
- ii. Have a light-colored exterior.
- iii. Construct using good engineering design and operate and maintain according to manufacturer-specified maintenance, and/or industry standards, as appropriate.

- c. Transloading EU-1

- i. Install a VCU as the control unit for the loading rack. Maintain and operate the VCU to control VOC emissions generated from loading product from EU-4, EU-5, and EU-6 through the loading rack to tanker trucks, such that the controlled VOC emission rate does not exceed 12.0 mg/L of liquid loaded.
- ii. Load trucks via submerged fill pipe.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 5 of 13

d. Direct Transloading EU-2

- i. Install a vapor balance system with 98.7 percent collection efficiency for direct transfers from rail to truck.

e. Transloading EU-3

- i. Proper operation of transloading equipment.

f. Equipment Leaks

- i. Proper piping design and installation. Proper design and installation practices may include the following techniques: manually verifying that all joints are tight; visually confirming that all pipes are properly assembled; ensuring proper seal design/selection; ensuring proper installation of valve packing or O rings; and manually inspecting the installation of the disk gaskets on pressure relief devices.

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty percent.
[391-3-1-.02(2)(n)]

4. Process & Control Equipment

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be recorded in a permanent form, suitable and available for inspection by the Division. The records shall be retained for at least five years following the date of such maintenance.
[391-3-1-.03(2)(c)]
- 4.2 The Permittee shall maintain an inventory of spare parts for the vapor control system.
[391-3-1-.03(2)(c)]
- 4.3 The Permittee shall operate all air pollutants emissions control devices at all times that associated equipment is being operated.
[391-3-1-.03(2)(c)]

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 6 of 13

5. Monitoring

- 5.1 Any monitoring system installed by the Permittee shall be in continuous operation except during calibration checks, zero and span adjustments, or periods of repair. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.
[391-3-1-.02(6)(b)1]
- 5.2 The Permittee shall install, calibrate, operate, and maintain, according to manufacturer's instructions, a heat sensing device, or equivalent, to continuously monitor and indicate the presence of a flame in the VCU. For the purposes of the reporting requirements of Condition 7.6, a deviation is defined as any time period during which the loading rack is in operation for the transfer of liquid product from EU-4, EU-5, or EU-6 to tanker truck without the presence of the pilot flame in the VCU.
[391-3-1-.02(6)(b)1]
- 5.3 The Permittee shall install, calibrate, operate and maintain, according to manufacturer's instructions, an electronic interlock control system to detect any improper operation of the pollution control system. The electronic interlock control system shall monitor permissives including but not limited to presence of combustor flame, updated truck compliance certifications, and any other emissions-related permissive as recommended by the control equipment manufacturer. The electronic interlock control system shall prevent volatile organic liquid loading operations until all conditions ("permissives") have been met.
[391-3-1-.02(6)(b)1]
- 5.4 For internal floating roof storage vessels which are subject to 40 CFR 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984*. In particular, the Permittee shall meet the following requirements:
[40 CFR 60.113b(a)]
- a. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling the storage vessel.
 - b. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Division in the inspection report required in Condition 5.4(c). Such a request for

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 7 of 13

an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

- c. For vessels equipped with a double-seal system as specified in Condition 2.4(b)(ii):
 - i. Visually inspect the vessel as specified in Condition 5.4(d) at least every 5 years; or
 - ii. Visually inspect the vessel as specified in Condition 5.4(b).
- d. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Condition 5.4(b) and 5.4(c)(ii) and at intervals no greater than 5 years in the case of vessels specified in Condition 5.4(c)(i).
- e. Notify the Division in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Condition 5.4(a and d) to afford the Division the opportunity to have an observer present. If the inspection required by Condition 5.4(d) is not planned and the Permittee could not have known about the inspection 30 days in advance or refilling the tank, the Permittee shall notify the Division at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Division at least 7 days prior to the refilling.

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
 - a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 8 of 13

- c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
 - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.
- 6.2 Within 180 calendar days of startup of the VCU, the Permittee shall conduct an initial performance test to demonstrate compliance with the VOC limit of 12 mg/L liquid loaded stated in Condition 2.3.
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall submit written notification of startup to the Division within 15 days after such date. The notification shall be submitted to:
Mr. Sean Taylor
Stationary Source Compliance Program
4244 International Parkway, Suite 120
Atlanta GA 30354
- 7.2 The Permittee shall furnish the Division written notification as follows:
[40 CFR 60.7(a)(1) and (3)]
- a. The date of construction of each Tank EU-4, EU-5, and EU-6, no later than 30 days after such date.
 - b. The actual date of initial startup of each Tank EU-4, EU-5, and EU-6, within 15 days after such date.
 - c. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the Permit.
- 7.3 The Permittee shall maintain a monthly log of all volatile organic liquid throughputs for the tank truck loading rack. The log shall be maintained in a form suitable and available for inspection by the Division and shall be retained for at least five years from the date of last entry.
[391-3-1-.02(6)(b)1]

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 9 of 13

- 7.4 The Permittee shall record all periods during which the interlock system fails. Documentation shall include date and time of failure, cause of failure, corrective actions taken, and return to service date and time.
[391-3-1-.02(6)(b)1]
- 7.5 The Permittee shall use the monthly log required by Condition 7.3 to calculate the total monthly throughput for the volatile organic liquids handled during the month. The Permittee shall notify the Division in writing if any throughput exceeds one-twelfth of its rolling annual limit allowed by this permit during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the limits stated in Condition 2.3. (Exceedance of one-twelfth the rolling annual limit does not constitute a violation of Condition 2.3).
[391-3-1-.02(6)(b)1]
- 7.6 The Permittee shall submit a written report of deviations (as defined in Condition 5.2) from the applicable limitations or standards and monitor malfunctions for each semi-annual period. All reports shall be postmarked by the 30th day following the end of the applicable semi-annual period. The contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:
[391-3-1-.02(6)(b)1]
- a. A summary report of deviations and monitor downtime in accordance with Section 1.5(c) and (d) of those procedures.
 - b. Total process operating time during the semi-annual period.
 - c. All deviations computed in accordance with the applicable definitions of such deviations as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of such deviation. When no deviation has occurred during a particular semi-annual period, the report shall state such information.
 - d. Specific identification of each period of such deviation(s) that occurs during startups, shutdowns, or malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
 - e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks and the nature of the system repairs, adjustments or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- 7.7 The Permittee shall maintain a file of all measurements, except as provided by Condition 5.1, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 10 of 13

performed on these systems or devices; and all other information required by this permit recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records.

[391-3-1-.02(6)(b)1]

- 7.8 For the internal floating roof storage vessels which are subject to 40 CFR 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984*. In particular, the Permittee shall keep records and furnish reports as required by this Condition, except for the record required by Condition 7.8(a), for at least 2 years. The record required by Condition 7.8(a) shall be kept for the life of the control equipment.

[40 CFR 60.115b(a)]

- a. Furnish the Division with a report that describes the control equipment and certifies that the control equipment meets the specifications of Condition 2.4. This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3).
- b. Keep a record of each inspection performed as required by Condition 5.4(a, b, c and d). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- c. If any of the conditions described in Condition 5.4(b) are detected during the annual visual inspection required by Condition 5.4(b), a report shall be furnished to the Division within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made
- d. After each inspection required by Condition 5.4(c) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition 5.4(c)(ii), a report shall be furnished to the Division within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of Condition 2.4 or Condition 5.4(c) and list each repair made.

- 7.9 For each internal floating roof storage vessels which are subject to 40 CFR 60 Subpart Kb, the Permittee shall:

[40 CFR 60.116b (a, b, c, d and e)]

- a. Keep copies of all records required by Condition 7.8, except for the record required by Condition 7.8(b), for at least 2 years. The record required by Condition 7.8(b) will be kept for the life of the source.
- b. For each storage vessel as specified in 40 CFR 60 Subpart Kb, the Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 11 of 13

- c. For each storage vessel either with a design capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa, the Permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
 - d. For each storage vessel either with a design capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa, the Permittee shall notify the Division within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.
 - e. Available data on the storage temperature may be used to determine the maximum true vapor pressure. For refined petroleum products the vapor pressure may be obtained from available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see 40 CFR 60.17), unless the Division specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
- 7.10 The Permittee shall keep a record of each inspection performed as required by Condition 5.4. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof and fittings). If any failures are detected by the visual inspection required by Condition 5.4, a report shall be furnished to the Director within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. The report shall identify the storage vessel and the reason it did not meet the specifications.
[391-3-1-.02(6)(b)1]
- 7.11 In accordance with 40 CFR 60.113b the Permittee shall notify the Director in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Condition 7.10 to afford the Division the opportunity to have an observer present. If the inspection required by Condition 7.10 is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the Division at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail if necessary, so that it is received by the Division at least 7 days prior to the refilling.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 12 of 13

- 7.12 The Permittee shall maintain a record of the following information for 40 CFR 60 Subpart Kb tanks at the facility. The information shall be available for inspection or submittal to the Division.
[40 CFR 60.116b]
- a. A record of the dimensions of each storage tank and an analysis showing the capacity of the said tank shall be maintained for the life of the source.
 - b. A record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."
- 8.3 The Permittee shall keep, at the permitted facility, the originals or complete copies of this Air Quality Permit and any subsequent Amendments to it.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
5172-121-0962-S-01-0**

Page 13 of 13

Attachment A – Equipment List

Emission Units		Air Pollution Control Devices		Federal Rule Applicability
ID No.	Description	ID No.	Description	
EU-1	Transloading – Storage Tanks EU-4, EU-5, EU-6, and EU-7 to Tanker Truck through Loading Rack	VCU	Vapor Combustion Unit	n/a
EU-2	Direct Transloading – Railcar to Truck	n/a	n/a	n/a
EU-3	Transloading – Railcar to Storage Tank (Tank 105 through Tank 114)	n/a	n/a	n/a
EU-4	Tank 101 – Internal Floating Roof	n/a	Mechanical shoe seal with secondary wiper seal.	40 CFR 60 Subpart Kb
EU-5	Tank 102 – Internal Floating Roof	n/a	Mechanical shoe seal with secondary wiper seal.	40 CFR 60 Subpart Kb
EU-6	Tank 103 – Internal Floating Roof	n/a	Mechanical shoe seal with secondary wiper seal.	40 CFR 60 Subpart Kb
EU-7	Tank 104 – Vertical Fixed Roof	n/a	n/a	n/a
EU-8	Bulk Solids Direct Transloading	n/a	n/a	n/a

- [1] This “Facility Description” contains information regarding specific emissions points and was created as a reference for certain other Conditions in this Permit. It is not intended to be a comprehensive list of all air pollution sources at this facility and may not include every minor or fugitive emission source. Future minor modifications or additions at this facility may be exempted from permitting by the Georgia Rules for Air Quality Control and may occur without causing this Attachment to be updated.
- [2] VCU applies to transloading product from Storage Tanks EU-4, EU-5, and EU-6 through loading rack to tanker truck